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<b>IN RE:</b>	)	
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<b>REVIEW OF NASHVILLE GAS</b>	)	<b>T.R.A. DOCKET ROOM</b>
<b>COMPANY'S IPA RELATING TO ASSET</b>	)	
<b>MANAGEMENT FEES</b>	)	<b>DOCKET NO. 05-00165</b>
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**REQUESTS FOR ADMISSION TO NASHVILLE GAS COMPANY  
BY THE CONSUMER ADVOCATE AND PROTECTION DIVISION**

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To: Nashville Gas Company  
c/o James H. Jeffries IV, Esq.  
Moore & Van Allen  
100 North Tryon Street, Suite 4700  
Charlotte, North Carolina 28202-4003

c/o R. Dale Grimes, Esq.  
Bass, Berry & Sims, PLC  
2700 First American Center  
Nashville, Tennessee 37238-2700

These Requests for Admission are hereby served upon Nashville Gas Company, a Division of Piedmont Natural Gas Company, Inc. ("Nashville Gas", "Piedmont" or "Company"), pursuant to Rule 36 of the Tennessee Rules of Civil Procedure. We request that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate and Protection Division, 425 Fifth Avenue North, Nashville, Tennessee 37243, c/o Joe Shirley or Steve Butler, on or before December 14, 2005.

## **DEFINITIONS**

For purposes of these Requests for Admission, the term “you” shall mean and include: Nashville Gas Company, Piedmont Natural Gas Company, Inc. and all employees, agents and representatives thereof.

## **INSTRUCTIONS**

(1) If your response to any Request for Admission is other than an unqualified admission, state for each such Request for Admission the following:

(a) all facts that you contend support in any manner your refusal to admit or your qualification of your admission;

(b) the name and address of all persons, including, but not limited to, consultants purporting to have any knowledge or factual data upon which you base your refusal to admit or your qualification of your admission;

(c) the identity of all documents, or any tangible or intangible thing, that supports in any manner your lack of admission or your qualification of your admission;

(d) the name and address of the custodian of all documents and tangible things identified in response to subsection (c); and

(e) the correct information for any Request for Admission that you contend is incorrect or inaccurate.

(2) If you fail to admit or deny any Request for Admission based on your asserted lack of information or knowledge, for each such Request for Admission describe your efforts toward satisfying the reasonable inquiry requirement of Rule 36 of the Tennessee Rules of Civil Procedure.

## **REQUESTS FOR ADMISSIONS**

You are specifically requested to admit:

1. As of April 21, 1999, Piedmont subscribed to and managed more than 1.2 million dekatherms per day of peak-day and upstream transportation and storage capacity on nine interstate natural gas pipelines.

RESPONSE:

2. As of April 21, 1999 Piedmont had wide-ranging participation in the interstate natural gas market and was an active participant in the secondary markets for interstate natural gas pipeline capacity and regularly engaged (as both buyer and seller) in capacity release transactions.

RESPONSE:

3. As of April 21, 1999 Piedmont had not utilized an asset manager for the purpose of implementing the capacity management function.

RESPONSE:

4. Capacity release transactions were largely automated by April 1999, and the automation had wrung most inefficiencies out of the wholesale market.

RESPONSE:

RESPECTFULLY SUBMITTED,



JOE SHIRLEY, B.P.R. #22287  
STEVE BUTLER, B.P.R. #14772  
Assistant Attorneys General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202  
(615) 741-3549

Dated: November 14, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been served via first-class U.S. mail, postage prepaid, on this 14th day of November, 2005, upon:

James H. Jeffries IV, Esq.  
Moore & Van Allen  
100 North Tryon Street, Suite 4700  
Charlotte, North Carolina 28202-4003

R. Dale Grimes, Esq.  
Bass, Berry & Sims, PLC  
2700 First American Center  
Nashville, Tennessee 37238-2700

Aaron Rochelle, Esq.  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505



STEVE BUTLER  
Assistant Attorney General

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